

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NORTH CAROLINA
SOUTHERN DIVISION

FILED IN OPEN COURT
ON 4-10-2018
Peter A. Moore, Jr., Clerk
US District Court
Eastern District of NC JTA

NO. 7:18-cr-00074-1D(1)
NO. 7:18-cr-00074-2D(1)

UNITED STATES OF AMERICA)

v.)

INDICTMENT

JONATHAN MISAEL GOMEZ)

ERICA DIANE ALLEN)

The Grand Jury charges that:

COUNT ONE

On or about February 22, 2018, in the Eastern District of North Carolina, the defendants, JONATHAN MISAEL GOMEZ and ERICA DIANE ALLEN, aiding and abetting one another, did knowingly and intentionally distribute a quantity of cocaine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(b)(1)(C) and Title 18, United States Code, Section 2.

ALLEGATIONS OF PRIOR CONVICTIONS

For purposes of Title 21, United States Code, Sections 841(b) and 851, the defendant, JONATHAN MISAEEL GOMEZ, committed the violations alleged the Indictment after at least one (1) prior conviction for a felony drug offense, as defined in Title 21, United States Code, Section 802(44), had become final.

FORFEITURE NOTICE

The defendants are given notice of the provisions of Title 21, United States Code, Section 853, that all of their interest in all property specified herein is subject to forfeiture.

As a result of the offenses charged in Counts One and Two of the Indictment, the defendants shall forfeit to the United States any and all property constituting, or derived from, any proceeds the defendant obtained directly or indirectly as a result of the said offenses and any and all property used or intended to be used in any manner or part to commit and to facilitate the commission of the offense alleged, or any property traceable to such property. If any of the above-described forfeitable property, as a result of any act or omission the defendant,

- (1) cannot be located upon the exercise of due diligence;
- (2) has been transferred or sold to, or deposited with, a third person;
- (3) has been placed beyond the jurisdiction of the court;
- (4) has been substantially diminished in value; or

(5) has been commingled with other property which cannot be subdivided without difficulty; it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of said defendant up to the value of the above forfeitable property.

A TRUE BILL:

REDACTED VERSION

Pursuant to the E-Government Act and the federal rules, the unredacted version of this document has been filed under seal.

FOREPERSON

DATE: 10 APR 2018

ROBERT J. HIGDON, Jr.
United States Attorney



BY: JOHN BRADFORD KNOTT
Assistant United States Attorney